

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
)
v.) No. 07 CR 747
)
JERROD SANDERS) Hon. David H. Coar

GOVERNMENT'S PROPOSED VOIR DIRE QUESTIONS

The UNITED STATES OF AMERICA, by its attorney, PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, respectfully requests that the following questions be asked to the venire during the course of the Court's voir dire examination:

1. Have you, a member of your family, or a close friend ever been arrested or charged for any criminal offense other than a traffic offense? If yes, please indicate: (a) the individual's relationship to you; (b) the nature of the offense; and (c) the disposition of the charge, including the sentence if any.

2. Have you, a member of your family, or a close friend ever been a victim of a crime? If so, tell us when and describe the kind of case or cases involved.

3. Have you appeared as a witness in relation to any trial or before a grand jury?

4. Have you ever served on a jury before? If yes, please describe the nature of the case and whether the jury deliberated or reached a verdict.

5. If you answered yes to questions 1, 2, 3, or 4, please state whether this experience left you with a negative, positive, or neutral impression of judges, the judicial system, prosecutors, criminal defense attorneys, or law enforcement officers.

6. Do you have any close friends or relatives who are judges, prosecutors, or criminal defense attorneys? If yes, is there anything about your friendship with or relation to this individual

that would make it difficult for you to evaluate the evidence fairly and impartially in this case, and render a fair verdict based on that evidence?

7. Have you ever had any legal training, taken any law courses, or worked in a law office? If so, please state the circumstances.

8. Have you or anyone in your immediate family been employed by the federal government? If so, please state what the employment was and when and where it occurred.

9. Have you, a member of your family, or any close friends ever filed a claim or case against the federal government or had a legal dispute with the federal government? If so, please state the nature of the claim or dispute, any resolution of the matter, and when and where the dispute occurred. Was there anything about those proceedings or the circumstances leading up to them that left you with negative feelings toward the federal government?

10. Are you a member of any clubs, organizations or associations?

11. This case was investigated by the Chicago Police Department and the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). Have you had any experiences or do you have any feelings regarding these law enforcement agencies, or any other law enforcement agency, that might make it difficult for you to evaluate the evidence fairly and impartially and render a fair verdict based on that evidence?

12. The federal government is authorized to prohibit the possession of firearms by convicted felons. Do you have any objections or disagreements with the laws prohibiting the possession of firearms by convicted felons that would cause you to be unfair to the government or the defendant in this case?

13. The defendant is charged with possessing a firearm after previously having been convicted of a felony. Is there anything about the nature of the charge that might affect your ability

to evaluate the evidence fairly and impartially and render a fair verdict in this case?

14. Do you hold any religious, philosophical, moral, or other beliefs that would make it difficult for you to sit in judgment of another person?

15. At various times during the case, the Court will instruct you about the applicable law. It is your obligation to follow the Court's instructions about the law, whether you agree with the law or not. If you were to find that you disagreed with the law as given to you by this Court, would you still be able to follow that law and reach a verdict by applying the law to the evidence?

Dated: August 13, 2008

Respectfully submitted,

PATRICK J. FITZGERALD
United States Attorney

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CERTIFICATE OF SERVICE

The undersigned Assistant United States Attorney hereby certifies that in accordance with FED. R. CRIM. P. 49, FED. R. CIV. P. 5, LR5.5, and the General Order on Electronic Case Filing (ECF), the Government's Proposed Voir Dire Questions were served pursuant to the district court's ECF system as to ECF filers on August 13, 2008.

s/ Julie B. Ruder

Julie B. Ruder

Assistant United States Attorney